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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

RIA R SQUARED, INC.,)	Case No. 21-CV-125-S
a Delaware corporation)	
)	
<i>Plaintiff,</i>)	
)	
v.)	
)	
PAUL D. MCCOWN, and)	
MCCOWN ENTERPRISES, LLC,)	
)	
<i>Defendants.</i>)	

MOTION TO VACATE AND RESET INITIAL PRETRIAL CONFERENCE

COMES NOW Defendants, Paul D. McCown and McCown Enterprises, LLC, by and through counsel, Jason M. Tangeman, of Nicholas and Tangeman, LLC, and respectfully moves that the Court to vacate the Initial Pretrial Conference currently set in this matter for January 6, 2022, at 9:00 a.m. and reset the matter at the Court's convenience. Counsel for the defendants has long standing family vacation plans for January 3 – 14, 2022 which include air fare to Hawaii.

WHEREFORE counsel for Defendants respectfully requests the Court reset the matter at its earliest convenience, but after January 14, 2022.

DATED: December 17, 2021

/s/ Jason M. Tangeman
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CERTIFICATE OF SERVICE

I hereby certify that, on December 17, 2021, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to all registered counsel of record.

s/ Jason M. Tangeman